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JUL 31 2006

Filed On: October 18, 2001

Serial No. 09/981,453

July 31, 2006

Response to office action mailed May 31, 2006

**Remarks**

Claims 21-22, 24-30, 32-33, 41-50, 64-77, and 79 are pending in the present patent application. In order to clarify issues for appeal, Claims 51-63 have been canceled pursuant to 37 CFR §1.116, without prejudice or disclaimer of the subject matter. Reconsideration of the pending Claims and allowance is respectfully requested in view of the amendments to the Claims and the following comments.

**The 35 U.S.C. §103(a) Claim Rejections**

In the office action mailed May 31, 2006, Claims 21-22, 24-30, 32-33 41-50 64-77 and 79 stand rejected pursuant to 35 U.S.C. §103(a) as being obvious in view of the combination of U.S. Patent No. 6,635,089 to Burkett et al. (hereinafter "Burkett") and U.S. Patent No. 6,418,446 to Lektion et al. (hereinafter "Lektion"). In addition, Claims 51-63 were rejected pursuant to 35 U.S.C. §103(a) as being obvious in view of the combination of Burkett and U.S. Patent No. 6,658,625 to Allen (hereinafter "Allen"). Claims 51-63 have been canceled rendering the corresponding rejections moot. With regard to Claims 21-22, 24-30, 32-33 41-50 64-77 and 79, Applicant respectfully traverses the corresponding rejections because the cited combinations of the art fail to teach, suggest, or disclose each and every limitation of the claims, and thus a *prima facie* case of obviousness in view of the cited art cannot be maintained.

**Claims 21-22, 24-30, 32-33, and 71-75**

On page 17 of the final rejection mailed May 31, 2006, it was indicated that Burkett teaches that a DOM document was tailored or modeled on the input data. Applicant does not disagree. However, Claim 21 does not describe such a limitation. To the contrary, Claim 21 describes that data in each of the fields are limited to a data type that is pre-specified in a business services application, not pre-specified in input data. Thus, Burkett teaches away from

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the limitation described in Claim 21. In addition, Lektion describes a format that is required for the source data structure (Col. 7 lines 64-66), and that the records representing any type of structured source information may be specified for use (Col. 9 lines 46-51). Accordingly, Lektion does not pre-specify a data type in a business services application as described in Claim 21, but rather specifies a datatype in a source data structure.

In addition, for purposes of appeal, Applicant respectfully traverses that Burkett and/or Lektion teach or suggest translation of request parameters to a format identified with the pre-specified data type that is pre-specified, not by the request parameters, but by a business services application as described in Claim 22. To the contrary, both Burkett and Lektion simply describe that XML documents are converted to a DOM tree, not translated to a format identified with such a pre-specified data type. Similarly, neither Burkett nor Lektion teach or suggest an attribute of the request that is translated to a format identified, not in the request, but in the pre-specified data type that is pre-specified in the business services application as described in Claims 25 and 30. Moreover, it is respectfully asserted that neither Burkett nor Lektion teaches or suggests selection of a mode debug flag as described in Claim 26. To the contrary, neither Burkett nor Lektion mention any kind of selectable flag, and especially not a flag related to the length of field names as described in Claim 26. Also, neither Burkett nor Lektion teach or suggest that a static declaration of a datatype is loaded based on a list of fields expected in a request as described in Claim 28. Instead, both Burkett and Lektion rely on the request to dictate the datatype and are completely silent on any list of what fields are expected. Nor do Burkett or Lektion teach or suggest that a form of data is converted based on the pre-specified data type as described in Claim 29.

#### Claims 41-50, 76-77, and 79

On page 18 of the office action mailed May 31, 2006 it was asserted that the same basis for rejection of Claim 21 applies to Claim 41. Applicant respectfully emphasizes that Claim 41

Serial No. 09/981,453

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describes a class operable on a server that includes a listing of pre-specified fields each of which describe a corresponding pre-specified data type to which the format of corresponding fields included in an input message are limited. Claim 41 clearly describes data types that are pre-specified in a class operable on a server, not data types included in source information (such as an XML document) being converted to a DOM tree as described in Lektion (Col. 9 lines 52-60), and Burkett (Col. 2 lines 44-48). Claim 41 also describes executable custom application code, not source information, that includes a pre-specified data type to limit the format of fields included in an input message that do not correspond to the listing of pre-specified fields included in the MESSAGEDEFINITION class. Clearly, neither Burkett nor Lektion even mention a class and executable custom application code that each include pre-specified data types. Accordingly, neither Burkett nor Lektion can possibly describe a listing of pre-specified fields used to limit a format of corresponding fields in an input message, and another pre-specified data type to limit the format of fields in the input message that do not correspond to the listing. As previously discussed, both Burkett and Lektion are simply using the information provided from a data source, and thus allow the information being converted to a DOM to dictate the format of the DOM.

Also, for purposes of appeal, none of the cited art teaches a pre-specified data type included in executable custom code that is operable to limit a format of fields included in an output message as described in Claim 42. In addition, the cited art does not teach or suggest a mode debug flag as described in Claim 46, and as previously discussed, or that a short and a long field name selectable with the mode debug flag are defined in the MESSAGEDEFINITION class as described in Claim 47.

#### Claims 64-70

Applicant respectfully emphasizes that Claim 64 describes a server computer operable to execute instructions to restrict the conversion of a document object model based on a listing of datatypes that are pre-specified for the request parameters. On page 20 of the office action

Serial No. 09/981,453

Filed On: October 18, 2001

July 31, 2006

Response to office action mailed May 31, 2006

mailed May 31, 2006, it was asserted that a listing of datatypes was obtained via the inherent parsing and subsequent tree structure construction performed via DOM processing. However, Applicant respectfully asserts that a pre-specified listing cannot be one that is obtained via DOM processing. To the contrary something which is pre-specified by its very nature must have been specified previously. Even if a listing is generated during DOM processing, it clearly cannot be a pre-specified listing since such a list was not specified prior to DOM parsing.

In addition, Burkett specifically describes a DOM tree is constructed based on the syntax of tags embedded in a file. (Col. 2 lines 44-47) Nowhere does Burkett make clear that a pre-specified listing is necessarily present and/or generated. Inherency may not be established by probabilities or possibilities, and the mere fact that a certain thing may result from a given set of circumstances is not sufficient. (See MPEP §2112 (IV) ) In addition, the Examiner must provide a basis in fact, and/or technical reasoning to support such a determination. MPEP §2112 (IV). Applicant respectfully asserts that neither Burkett, Lektion, nor the Examiner have provided sufficient evidence that a pre-specified listing is obtained during DOM processing. Thus, a rejection based on such unfounded conjecture cannot stand.

For at least the foregoing reasons, the combination of Burkett and Lektion fail to fulfill the third basic criteria for obviousness that must be met, which is that all the limitations of the claims must be taught or suggested by the combination of the cited prior art. Since all of the claim limitations described by Claims 21, 41 and 64 and the Claims dependent therefrom are not taught or suggested, a *prima facie* case of obviousness cannot be maintained. Applicant respectfully requests withdrawal of the 35 U.S.C. §103(a) rejection of Claims 21-22, 24-30, 32-33, 41-50, 64-77, and 79.

### Conclusion

In view of the amendments to the Claims and the above discussion, the application is believed to now be in condition for allowance, which is respectfully requested. Should the

Serial No. 09/981,453

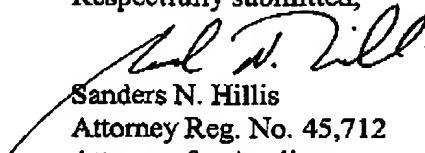
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Examiner deem a telephone conference to be beneficial in expediting examination and/or allowance of this application, the Examiner is invited to call the undersigned attorney at the telephone number listed below.

Respectfully submitted,

  
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SNH/sev

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